

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

ZACH ELLIS, GERONIMO PEREZ,  
ARTURO SALINAS, JARROD M.  
DANIEL, and KERRY TAWATER,  
Individuals

Plaintiffs

VS.

CASE NO. 2:15-CV-00058-J

TRI-STATE OIL FIELD SERVICES, Inc.,  
a Texas Corporation, RICARDO “RICKY”  
CANTU, and individual, RICKY’S  
TOWING OF AMARILLO, LLC, a Texas  
limited liability company, KATRINA  
KINCAID, an individual, and CANTU  
TOWING, LLC, a Texas limited liability  
company,

## Defendants

## **DEFENDANTS RESPONSE TO PLAINTIFFS MOTION TO COMPEL**

COMES NOW the Defendants, TRI-STATE OIL FIELD SERVICES, INC., (“Tri-State”), RICARDO “RICKY” CANTU, RICKY’S TOWING OF AMARILLO (“Ricky’s Towing”), KATRINA KINCAID and CANTU TOWING (“Cantu Towing”), by and through its undersigned counsel, Darrell R. Carey, and files its Response to Plaintiffs Motion to Compel as follows:

1. Defendants have produced all documents responsive.
2. Defendant's Ricky's Towing of Amarillo, Katrina Kincaid and Cantu Towing do not have any documents regarding Tri-State Oil Field Services in their possession.
3. Defendants assert that a Motion to Compel is inappropriate in this matter since the main complaints of the Plaintiffs are that the Defendants didn't fully answer the discovery when in fact the Defendants did adequately answer the discovery.

PRAYER

WHEREFORE, PREMISES CONSIDERED Defendants move that this Court deny the Plaintiff's Motion to Compel and for Sanctions and that any and all further request of the Plaintiffs be denied and further relief as the Court deems just and proper.

Respectfully Submitted

/s/ Darrell R. Carey  
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**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the Defendants Response to Plaintiffs Motion to Compel on Jerry McLaughlin and Philip R. Russ on the 29th day of June, 2015.

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/s/ Darrell R. Carey  
Darrell R. Carey